

FILED
IN CLERKS OFFICE
UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
2020 DEC 28 AM 8:58

SALADIN FARD ALLAH
PLAINTIFF, DISTRICT COURT
DISTRICT OF MASS.

CIVIL ACTION
NO.

v.

CAROL MICI, et al.,
MICHAEL RODRIGUEZ,
DEFENDANT'S

PLAINTIFF'S VERIFIED MOTION FOR A TEMPORARY RESTRAINING
ORDER AND A PRELIMINARY INJUNCTION

Plaintiff, Saladin Fard Allah, ("Allah"), respectfully submits this verified Motion requesting an immediate Temporary Restraining Order, pursuant to Federal Rule Civil Procedure Rule 65, enjoining defendant's, Commissioner of Correction, Carol Mici, ("Mici"), and her subordinate Michael Rodriguez, ("Rodriguez"), and agents from illegally using a policy under a drug law that does not give the Department of Correction the force of law to enact Forfeitures for restitution out of plaintiff's personal account as part of a Disciplinary Sanction for violating a institutional rule for being in possession of alleged synthetic marijuana ("K-2"). however, No drug test has ever been conducted to determine if whether or not if in fact the synthetic marijuana was actually K-2. The policy in which the Department of Correction is using to unlawfully force the plaintiff to pay restitution is in violation of the laws that govern the state of Massachusetts and creates a legislature intent in violation of Article 30 to Massachusetts Declaration of Right's.

2.

Further, Plaintiff requests that the court issue a permanent injunction against the defendant's of the Department of Correction and her subordinates and agents permanently enjoining defendant's from seizing monies from plaintiff's personal account for restitution as a disciplinary sanction in violation of a Inmate Substance Abuse Monitoring And Testing Policy under 103 DOC 525.00. et seq., As grounds the plaintiff asserts and relies on his Declaration insupport of plaintiff's verified motion for temporary restraining order and preliminary injunction, with memorandum of law in support.

Date: 12/18/2020

RESPECTFULLY SUBMITTED

S. F. A.,

SALADIN FARD ALLAH, #W-55483
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P.O. BOX 1218
SHIRLEY, MA 01464

VERIFICATION

I, Saladin Fard Allah, hereby verify that the foregoing is a true attestation to the best of my knowledge, and recollection SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY ON THIS 18th, day of December of 2020.

S. F. A.,

SIGNATURE